

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

OPENAI, INC., OPENAI LP, OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OPCO LLC, OPENAI  
GLOBAL LLC, OAI CORPORATION, LLC,  
OPENAI HOLDINGS, LLC, and MICROSOFT  
CORPORATION,

Defendant.

ECF CASE

No. 1:23-cv-11195

**DECLARATION IN SUPPORT OF  
MOTION FOR ADMISSION OF  
ATTORNEY PRO HAC VICE**

Ian B. Crosby, declares:

1. I am a Partner with the law firm of Susman Godfrey L.L.P.
2. I submit this declaration in support of my motion for admission to practice *pro hac vice* in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the State Bar of Washington.
4. There are no pending disciplinary proceedings against me in any state or federal court.
5. I have never been convicted of a felony.
6. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.
7. My attorney registration number for the State Bar of Washington is 28461.

8. Wherefore, your declarant respectively submits that he be permitted to appear as counsel and advocate *pro hac vice* in case 1:23-cv-11195 for Plaintiff (The New York Times Company).

I, Ian B. Crosby, declare under penalty of perjury that the foregoing is true and correct.

Dated: January 3, 2024

Respectfully submitted,

/s/ Ian B. Crosby  
Ian B. Crosby  
WA State Bar No. 28461  
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***Attorney for Plaintiff***